

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

LM INSURANCE CORPORATION

PLAINTIFF

V.

NO.: 3:17-cv-735 CWR-FKB

LACEY HUDDLESTON, JONATHAN HUDDLESTON  
AND PENLOPE COOPER

DEFENDANTS

**UNCONTESTED MOTION TO AMEND [10] CASE MANAGEMENT ORDER**

COMES NOW, the Plaintiff LM Insurance Corporation (“LM”), by and through its undersigned counsel, and files this Uncontested Motion to Amend [10] Case Management Order, and in support thereof would show the Court the following, to-wit:

1. All parties agree to amend the current expert designation and discovery deadlines by an extension of two (2) weeks. Plaintiff respectfully contends this request will not prejudice any party.
2. The parties and their counsel have all worked in good faith to conduct discovery in this matter. Yet due to scheduling issues, there is some discovery that remains, including the agreement to and entry of a Protective Order for the production of confidential, sensitive proprietary documents by the Plaintiff, for which the Plaintiff has requested a discovery conference with the Court.
3. The parties have conducted rounds of written discovery. In addition, the parties will conduct the deposition of the Plaintiff. Any other needed depositions will be set as soon as possible.
4. Currently, by text order, the deadline for designation of expert witnesses by Plaintiff is June 8, 2018. The deadline for Defendants is July 9, 2018. Plaintiff would respectfully request that the deadline for designation of expert witnesses be amended to allow Plaintiff an additional

two (2) weeks until June 22, 2018 to designate expert witnesses. In addition, Plaintiff would respectfully request that Defendants have until July 20, 2018 to designate expert witnesses.

5. Counsel for Plaintiff is mindful that this request may impact other deadlines currently set in the Court's Case Management Order. Therefore, Plaintiff also requests that the Court extend the discovery deadline two (2) weeks, until August 3, 2018. If Plaintiff's request impacts any other deadlines, Plaintiff respectfully requests that the parties have a Case Management Conference with the Court by telephone, to reset any other needed deadlines.

WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully requests the Court to grant its Uncontested Motion to Amend [10] Case Management Order to allow Plaintiff until June 22 2018 to designate expert witnesses, allow Defendants until July 20, 2018 to designate expert witnesses, and extend the discovery deadline until August 3, 2018, and for any and all additional relief deemed appropriate by this Honorable Court.

Respectfully submitted, this the 7<sup>th</sup> day of June, 2018.

LM INSURANCE CORPORATION

/s/ Richard T. Conrad III

Clifford K. (Ford) Bailey, III (MSB #1686)

Richard T. Conrad III (MSB #10648)

ITS ATTORNEYS

OF COUNSEL:

WELLS MARBLE & HURST, PLLC

300 Concourse Boulevard, Suite 200

Ridgeland, Mississippi 39157

Telephone: 601-605-6900

Facsimile: 601-605-6901

Email: [fbailey@wellsmarble.com](mailto:fbailey@wellsmarble.com)

[rconrad@wellsmarble.com](mailto:rconrad@wellsmarble.com)

**CERTIFICATE OF SERVICE**

I, Richard T. Conrad III, hereby certify that on this day I electronically filed the foregoing pleading with the Clerk of the Court using the Electronic Case Filing (ECF) system, which sent notification of such filing to the following:

Eduardo A. Flechas, Esq.  
Flechas Litigation Group, PLLC  
318 South State Street  
Jackson, MS 39201  
[edflechas@aol.com](mailto:edflechas@aol.com)

COUNSEL FOR  
LACEY HUDDLESTON AND JONATHAN HUDDLESTON

Randy Wallace, Esq.  
Robert Boyd and Associates PLLC  
103 Woodchase Park Drive  
Clinton, MS 39056  
[randywallace@boydattorneys.com](mailto:randywallace@boydattorneys.com)

COUNSEL FOR PENELOPE COOPER

SO CERTIFIED, this the 7<sup>th</sup> day of June, 2018.

/s/ Richard T. Conrad III

Richard T. Conrad III